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March 22, 2024

VIA ECF

Hon. Jennifer Willis
United States Magistrate Judge
Southern District of New York
40 Foley Square, Room 425
New York, NY 10007

Re: **Request for Discovery Conference,**
Brockmole et al v. EZ Festivals LLC et al., 1:23-CV-08106-VM

Dear Magistrate Judge Willis,

Our firm represent Plaintiffs Anthony Palie, Dakota Bedell, Carl Corbo, Annabel Gould, Dolores Thompson, and Bridgette Winkelmann in the above-captioned consolidated class action (the “Action”), and we submit this letter on their behalf and on behalf all Plaintiffs in the Action – whose counsel have consented to and join in this letter – to request that the Court schedule an initial case management conference at its earliest convenience. This Action has been pending since the fall of 2023, all Defendants have been served with the relevant pleadings, and, while, via two separate motions filed yesterday, Defendants moved to dismiss *some* of Plaintiffs’ claims in the Action, their motions neither assert that a stay of discovery is warranted nor argue that the pleadings should be dismissed in their entirety as a matter of law. The parties’ counsel have had preliminary discussions about the scope and sequence of discovery. Scheduling a conference would give the parties a timeline to guide subsequent discussions and agreements. Accordingly, pursuant to Paragraph III.A of Your Honor’s Individual Rules of Practice, Plaintiffs request that the Court schedule an initial case management conference to address the conduct of discovery in this Action.

Plaintiffs’ counsel conferred with Defendants’ counsel about the instant request, with respect to which Defendants take no position.

Respectfully submitted,

/s/ Shelly L. Friedland
Shelly L. Friedland

cc (via ECF): All Counsel of Record